

**STATEMENT OF BASIS (AI No. 3589)**

For the draft Louisiana Pollutant Discharge Elimination System permit No. LA0046981 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Tennessee Gas Pipeline Company  
Tennessee Gas Pipeline (TGP) Station 523 (Cocodrie Station)  
8166 Highway 56 South  
Chauvin, Louisiana 70344

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Valerie Powe  
Water Permits Division  
Telephone: (225)219-3135  
valerie.powe@la.gov

**DATE PREPARED:** December 7, 2009

**1. PERMIT STATUS****A. Reason For Permit Action:**

Proposed reissuance of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit for a five year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46. Upon the effective date, this permit shall replace the previously effective Louisiana Pollutant Discharge Elimination System (LPDES) permit LA0046891.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

**B. LPDES permit -** LPDES permit effective date: December 1, 2003  
LPDES permit expiration date: November 30, 2008

The LPDES permit expired on November 30, 2008. The facility submitted its permit renewal application on June 3, 2008 and additional information via e-mail on January 26, 2010. Therefore, the permit was administratively continued.

Statement of Basis for  
Tennessee Gas Pipeline Company  
Tennessee Gas Pipeline (TGP) Station 523 (Cocodrie Station)  
LA0046981, AI No. 3589  
Page 2

## II. FACILITY INFORMATION

A. Location - 8181 Redfish Street, Cocodrie, Terrebonne Parish

B. Applicant Activity –

According to the application, Tennessee Gas Pipeline Station 523 is a natural gas compressor station. Natural gas, condensate, and produced saltwater from offshore production are separated, the gas is dehydrated, and saltwater is injected into a Class II injection well. The dried gas is compressed for transportation along the pipeline system. The condensate is stored in tanks and shipped out as product by either barge or liquids pipeline.

C. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4922

D. LOCATION – 8181 Redfish Street, Cocodrie, Terrebonne Parish (Latitude 29° 14' 13.2", Longitude 90° 40' 8.34")

E. Facility Effluent Flow – 70,002 GPD

## III. RECEIVING WATERS

STREAM – Houma Navigational Canal then to Bayou Petit Caillou

BASIN AND SEGMENT – Terrebonne Basin, Segment 120705 and 120702

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. oyster propagation

## IV. OUTFALL INFORMATION

Outfall 001 Deleted

Outfall 002

- A. Discharge Type: Intermittent discharge of treated sanitary wastewater
- B. Treatment: Mechanical sewage treatment plant with aeration and chlorine treatment
- C. Location: at the point of discharge from sewage treatment plant prior to combining with other waters (Latitude 29° 14' 14.2", Longitude 90° 40' 08.6")

Statement of Basis for  
 Tennessee Gas Pipeline Company  
 Tennessee Gas Pipeline (TGP) Station 523 (Cocodrie Station)  
 LA0046981, AI No. 3589  
 Page 3

- D. Flow: 650 gpd
- E. Receiving Waters: to an unnamed canal thence to the Murphy Slip and thence into the Houma Navigational Canal
- F. Basin and Segment: Ouachita River Basin, Segment No. 120705

Outfall 003 Deleted

Outfall 004 Deleted

Outfall 005 Deleted

Outfall 006

- A. Discharge Type: Intermittent discharge of stormwater runoff combined with equipment washwater domestic wastewater, scrubber filter flush water, condensed water from the air compressor system and platform floor drainage
- B. Treatment: a series of oil and water separation then into a evaporation pit for additional gravity separation, aeration , and microbial treatment
- C. Location: at the point of discharge from the evaporation pit that is tested to ensure compliance with effluent limitations prior to combining with others waters (Latitude 29° 14' 25.7", Longitude 90° 39' 51.4")
- D. Flow: 69, 372 GPD
- E. Receiving Waters: from the evaporation pit to Bayou Petit Caillou
- F. Basin and Segment: Terrebonne Basin, Segment No. 120702

## V. PROPOSED CHANGES FROM PREVIOUS PERMIT

The LPDES permit currently has four outfalls that are composed of only stormwater runoff. Based on a compliance review, Tennessee Gas has been in compliance with no exceedances since 2007. In accordance with LAC 33:IX.2511.C.1.c, operators of an existing facility composed entirely of stormwater from an oil and gas exploration, production, processing or treatment operations, or transmission facility is not required to obtain a permit. Therefore, Outfalls 001, 003, 004, and 005 will be removed from this permit.

## ADDITIONAL CHANGES

Based on new LDEQ guidance for sanitary wastewaters, the statistical basis has been changed for treated sanitary wastewater outfalls to a daily maximum in lieu of a weekly average for Flow, Biochemical Oxygen Demand (BOD<sub>5</sub>), Total Suspended Solids (TSS), and Fecal Coliform. Monthly averages for Flow, BOD<sub>5</sub>, TSS and Fecal Coliform are also included in Outfall 002. Kjeldahl Nitrogen and Phosphorus effluent limitations will be removed from Outfall 006. Based on the current TMDL, subsegment 120702 only includes Fecal Coliform as an impairment. The Discharge Monitoring Report (DMR) Requirements have been updated to include new language

Statement of Basis for  
Tennessee Gas Pipeline Company  
Tennessee Gas Pipeline (TGP) Station 523 (Cocodrie Station)  
LA0046981, AI No. 3589  
Page 4

which allows for electronic DMR submittals.

## VI. PERMIT LIMIT RATIONALE

The following sections set forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit.

### A. Outfall 002- Intermittent discharge of treated sanitary wastewater

Parameter	Monthly Average	Daily Maximum	Frequency	Sample Type
Flow	Report	Report	1/6 months	Estimate
BOD <sub>5</sub>	30 mg/L	45 mg/L	1/6 months	Grab
TSS	30 mg/L	45 mg/L	1/6 months	Grab
Fecal Coliform	---	43col/100ml	1/6 months	Grab
pH	6.0 min	9.0 max	1/6 months	Grab

#### Site-Specific Consideration(s)

**Flow:** established in accordance with LAC 33:IX.2707.1.1.b. Flow shall be monitored at a frequency of 1/6 months. These requirements have been retained from the administratively continued LPDES permit, effective December 1, 2003.

**BOD<sub>5</sub>:** effluent limitations are consistent with LPDES Class 1 Sanitary General Permit, LAG530000 and permitted facilities with similar operations at a frequency of 1/6 months. These requirements have been retained from the administratively continued LPDES permit, effective December 1, 2003.

**TSS:** effluent limitations are consistent with LPDES Class 1 Sanitary General Permit, LAG530000 and permitted facilities with similar operations at a frequency of 1/6 months. These requirements have been retained from the administratively continued LPDES permit, effective December 1, 2003.

**Fecal Coliform:** effluent limitations are consistent with LPDES Class 1 Sanitary General Permit, LAG530000 and permitted facilities with similar operations at a frequency of 1/6 months. These requirements have been retained from the administratively continued LPDES permit, effective December 1, 2003.

**pH:** effluent limitations are established in accordance with LAC33:IX.1113.C.1. Ph shall be monitored 1/6 months. These requirements have been retained from the administratively continued LPDES permit, effective December 1, 2003.

Statement of Basis for  
Tennessee Gas Pipeline Company  
Tennessee Gas Pipeline (TGP) Station 523 (Cocodrie Station)  
LA0046981, AI No. 3589  
Page 5

**Outfall 006** – Intermittent discharge of stormwater runoff combined with equipment washwater, domestic wastewater, scrubber filter flush water, and condensed water from the air compressor system and platform floor drainage

Parameter	Monthly Average	Daily Maximum	Frequency	Sample Type
Flow	Report	Report	1/month	Estimate
TOC	---	50 mg/L	1/month	Grab
COD	---	125 mg/L	1/month	Grab
Oil & Grease	---	15 mg/L	1/month	Grab
pH	6.0 min	9.0 max	1/month	Grab

Site-Specific Consideration(s)

**Flow:** established in accordance with LAC 33:IX.2707.I.1.b. Flow shall be monitored at a frequency of 1/month. These requirements have been retained from the administratively continued LPDES permit, effective December 1, 2003.

**TOC:** effluent limitations are based on Best Professional Judgment (BPJ), established in accordance with General Rationale for Natural Gas Processing Plants and Compressor Stations, and consistent with the Multi-Sector General Permit at a frequency of 1/month. These requirements have been retained from the administratively continued LPDES permit, effective December 1, 2003.

**COD** – effluent limitations are based on BPJ and established in accordance with General Rationale for Natural Gas Processing Plants and Compressor Stations at a frequency of 1/month. These requirements will be retained from the administratively continued LPDES permit, effective December 1, 2003.

**Oil and Grease:** effluent limitations are based on BPJ, established in accordance with General Rationale for Natural Gas Processing Plants and Compressor Stations, and consistent with the Multi-Sector General Permit at a frequency of 1/month. These requirements have been retained from the administratively continued LPDES permit, effective December 1, 2003.

**pH:** effluent limitations are established in accordance with LAC33:IX.1113.C.1. Ph shall be monitored 1/month. These requirements have been retained from the administratively continued LPDES permit, effective December 1, 2003.

Statement of Basis for  
Tennessee Gas Pipeline Company  
Tennessee Gas Pipeline (TGP) Station 523 (Cocodrie Station)  
LA0046981, AI No. 3589  
Page 6

## VII. TMDL Waterbodies

### Outfall 002

Outfall 002 includes intermittent discharges of treated sanitary wastewater to an unnamed canal thence to the Murphy Oil Slip and thence to the Houma Navigational Canal.

Subsegment 120705, Houma Navigation Canal is not listed on LDEQ's Final 2006 303(d). To date no TMDLs have been completed for this waterbody. Therefore, no additional reporting requirements were placed on Outfall 002.

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to be established. TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

### Outfall 006

Outfall 006 includes intermittent discharges of stormwater runoff combined with equipment washwater, domestic wastewater, scrubber filter flush water, and condensed water from the air compressor system and platform floor drainage from the evaporation pit to Bayou Petit Caillou.

Subsegment 120702, Bayou Caillou Petit is listed as impaired for fecal coliform. To date, no TMDLs have been completed for this waterbody. The discharges from Outfall 006 are primarily stormwater runoff combined with utility wastewaters and do not have the potential to contribute to impairments caused by pathogen indicators. Therefore, no additional reporting requirements were placed on Outfall 006.

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to be established. TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

## VIII. COMPLIANCE HISTORY/COMMENTS

### A. Compliance History

There are no open enforcement actions for Tennessee Gas Pipeline, Station 523 (Cocodrie Station).

### B. Inspections

A hurricane damage assessment was conducted on September 28, 2005. The following items were noted: Facility was not operating at the time of the inspection; flooding occurred with minor damage; no breach in the containment was observed; and no tank overflows occurred. No inspections have been conducted since September 28, 2005; therefore, permit writer has requested an inspection of the facility.

Statement of Basis for  
Tennessee Gas Pipeline Company  
Tennessee Gas Pipeline (TGP) Station 523 (Cocodrie Station)  
LA0046981, AI No. 3589  
Page 7

**C. DMR Review/Excursions**

A review of the Discharge Monitoring Reports (DMRs) from January 2007 to December 2009 revealed no exceedances.

**IX. "IT" QUESTIONS - APPLICANT'S RESPONSES**

This is an existing minor facility. IT questions were not required to be addressed.

**X. ENDANGERED SPECIES**

The receiving waterbodies, Houma Navigational Canal and Bayou Petit Caillou, Subsegments 120705 and 120702, of the Terrebonne River Basin are not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated January 11, 2010 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

**XI. HISTORIC SITES**

The discharge is from an existing facility. There should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

**XII. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to permit the discharges described in the application.

**XIII. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for  
Tennessee Gas Pipeline Company  
Tennessee Gas Pipeline (TGP) Station 523 (Cocodrie Station)  
LA0046981, AI No. 3589  
Page 8

#### **XIV. STORMWATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

The SWP3 shall be modified, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of stormwater pollution and ensure the implementation of practices to prevent and reduce pollutants in stormwater discharges associated with industrial activity at the facility.